

**Federal Defenders
OF NEW YORK, INC.**

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April 8, 2021

By ECF

Honorable Lewis A. Kaplan
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

**Re: United States v. Jeremy Spence
21 Cr. 116 (LAK)**

Dear Judge Kaplan,

I write to respectfully request that the Court adjourn the motions schedule and the next-scheduled conference in the above-captioned case for approximately 30 days. Currently, motions are due on April 15, opposition due on April 29, replies due May 6, and a conference on May 17, 2021. We ask that the new schedule be set as follows: motions due May 14, opposition due May 28, replies due June 4, 2021 and a conference at a date convenient for the Court thereafter.

We have received voluminous discovery materials from the government, which we are still in the process of reviewing. With a short adjournment, we will be able to complete that process and make any applicable Rule 12 motions. This is the first request for an adjournment. (And, the requested adjournment will not impact the November 30, 2021 trial date.)

The government, by Assistant United States Attorney Christine Magdo, consents to this application.

Given the nature of this request, the defense consents to the exclusion of time under the Speedy Trial Act until the newly selected date.

Thank you for your consideration.

Respectfully submitted,

/s/

Sylvie Levine
Counsel for Mr. Spence